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9 *Attorneys for Plaintiff CureIS Healthcare, Inc.*

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12
13 CureIS Healthcare, Inc.,

14 Plaintiff,

15 vs.

16 Epic Systems Corporation,

17 Defendant.

Case No. 3:25-cv-04108-MMC

**DECLARATION OF CHRISTOPHER
SAWOTIN IN SUPPORT OF PLAINTIFF
CUREIS HEALTHCARE INC.'S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE PARTIALLY UNDER
SEAL PORTIONS OF PLAINTIFF'S
OPPOSITION TO EPIC'S MOTION TO
UNSEAL**

18 Judge:

Hon. Maxine M. Chesney

19 Trial Date:

None Set

I, Christopher Sawotin, declare as follows:

1. I am the Chief Executive Officer of CureIS Healthcare Inc. (“CureIS”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I previously submitted a declaration in support of CureIS’s May 12, 2025 Administrative Motion for leave to File Under Seal Portions of its Complaint. The Court granted CureIS’s sealing request on May 13, 2025. (Dkt. 5.)

3. I also submitted a declaration in support of CureIS’s July 14, 2025 Administrative Motion for leave to File Under Seal Portions of its Amended Complaint. (Dkt. 38.)

4. I make this declaration in support of CureIS’s Administrative Motion for Leave to File Under Seal Portions of its Opposition to Epic’s Motion to Partially Unseal CureIS’s Complaint (the “Administrative Motion”) and my accompanying Declaration in Opposition to Epic’s Motion to Partially Unseal CureIS’s Complaint. (“Sawotin Decl.”).

5. CureIS’s Opposition (“Opposition”) and my accompanying declaration, proposed to be filed partially under seal, contain CureIS’s and CureIS’s customers’ highly confidential information, including confidential customer identities, and information from confidential agreements and contractual negotiations. The following limited portions of CureIS’s Opposition and the Sawotin Declaration and highlighted in the unredacted Opposition and Sawotin Declaration filed as Exhibits A and B to this Declaration, contain CureIS’s and CureIS’s customers’ confidential information, which would likely harm CureIS’s competitive standing and the competitive standing of its customers if publicly disclosed:

Opposition Selections	Reasons for Sealing (Highlighted Portions Only)
Pp. 3:9; 9:16-17	Non-public and commercially sensitive information regarding CureIS’s customer relationships and confidential customer contracts
Sawotin Declaration Paragraphs	Reasons for Sealing (Highlighted Portions Only)
7	Non-public and commercially sensitive information regarding CureIS’s customer relationships and confidential customer contracts

